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Counsel for Defendant
ROBERT RINEHART

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-00853 LHK (PSG)
)	
Plaintiff,)	STIPULATION TO MODIFY
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	PROPOSED ORDER
)	
ROBERT RINEHART,)	
)	
Defendant.)	
_____)	

Defendant ROBERT RINEHART (“Mr. Rinehart”) and the government, through their respective counsel, Assistant Federal Public Defender Robert Carlin, and Assistant United States Attorney Jeffrey Schenk, stipulate and agree, subject to the Court’s approval, to modify the defendant’s previously set pretrial release conditions to permit his travel to Phoenix, Arizona between December 28 and 30, 2012.

Mr. Rinehart is charged with wire fraud, in violation of 18 U.S.C. § 1343. Mr. Rinehart was released on a \$50,000 bond secured by his signature and that of his father, and his conditions of release include a prohibition of travel beyond the Northern District of California. To date, he has complied with his pretrial release conditions. Mr. Rinehart has longstanding

1 plans to attend the wedding of a very close friend in Phoenix, Arizona, on December 29, 2012.
2 The parties respectfully request that the Court modify Mr. Rinehart's bond conditions to allow
3 him to travel to Phoenix, Arizona on December 28 or 29 and to return on December 30, 2012.
4 Counsel has consulted with Mr. Rinehart's supervising United States Pretrial Services Officer
5 Ladrina Walton and she has no objection to the proposed modification.

6 Accordingly, the parties respectfully request that Mr. Rinehart's pretrial release
7 conditions be modified to permit his to travel to the Phoenix, Arizona, as requested, with all
8 other conditions to remain in effect.

9 It is so stipulated.

10 Date: December 21, 2012

11 /S/
ROBERT CARLIN
Assistant Federal Public Defender

12 Date: December 21, 2012

13 /S/
JEFFREY SCHENK
Assistant United States Attorney

14
15 **[Proposed] ORDER**

16 GOOD CAUSE APPEARING, pursuant to the stipulation of the parties, IT IS HEREBY
17 ORDERED that the conditions of release previously set in this matter shall be modified to permit
18 Defendant ROBERT RINEHART to travel to the Phoenix, Arizona between December 28 and
19 30, 2012. All other conditions are to remain in effect.

20 IT IS SO ORDERED.

21 Dated: December 21, 2012

22 
HONORABLE PAUL S. GREWAL
United States Magistrate Judge